FOIA EXEMPT

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WA 2917
9-28-87

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Narrative Inspection Report

Facility: Chemical Processors, Inc. (Chem Pro)
ID No. WADO0812917
Address: Pier 91, Seattle Washington

Date of Inspection: September 28, 1987

Inspectors: A. Boyd, EPA – Seattle
J. Pankanin, EPA – Seattle
L. Ashley, DOE – Northwest

Report prepared by: Andrew Boyd 5/31/88
RCRA Compliance Section
EPA – Seattle

Purposes of the Inspection:

(1) to assess compliance with applicable hazardous waste laws and regulations,
(2) to provide field experience,

Introduction

The State of Washington Department of Ecology (DOE) hazardous waste program has been authorized by EPA, and operates in lieu of the federal program. However, EPA retains responsibility for administering requirements imposed by the 1984 amendments to RCRA. The facility is located on the Pier 91 compound, which is owned by the Port of Seattle.

General Facility and Process Information

The Chem Pro facility opened on 7/1/70 and operates primarily as a waste oil reclamation facility. Re-usable oil is reclaimed by seperating impurities in tanks. Oil/water seperation, phenol oxidation, precipitation of heavy metals, pH adjustment, and chromium reduction in the tanks are the methods described in the facility's Part A permit application. Waste is received from a number of sources, including petroleum refining, bilge water from barges and tankers, paint booth wastes, and contaminated water.

Notification and Permitting

Chem Pro submitted a Notification of Hazardous Waste Activity (form 8700-12) dated 8/13/80, received by EPA on 8/18/80. The notification indicated that the facility is a generator, transporter, and treatment, storage & disposal facility.

Chem Pro submitted a Part A application dated 11/14/80, received by EPA on 11/18/80. The Part A was revised on 7/23/82, and on 2/18/86. The revised Part A indicates that the facility treats and stores hazardous waste in tanks, and operates a centrifuge for dewatering solids and sludges. The facility reported a tank storage capacity of 9,036,090 gallons, and a tank treatment capacity of 40,000 gallons per day.

Facility Inspection - General

Photographs were taken by J. Pankanin.

Opening Conference

After meeting with Dennis Stefani, Manager of Regulatory Affairs, at the Chem Pro offices, we arrived at the Chem Pro Pier 91 facility at about 10:15 a.m. We were met there by Nate Matthews, Chem Pro Pier 91 Plant Manager.

I told Chem Pro officials that the purpose of the inspection was to assess facility compliance with applicable hazardous waste laws and regulations. I then questioned N. Matthews on facility operations. His descriptions of operations are summarized below. A more complete description of facility operations is contained in the report for the EPA inspection conducted on 7/15/86.

They recieve waste oil for reprocessing and for blending, machine oils and coolants for treatment, and ballast, bilge and oily waste water for treatment.

Pacific Northern Oil is the outlet for their reprocessed oil. They operate alongside the Chem Pro facility, and use the oil as marine boiler fuel.

Treatment of wastes received includes precipitation and floculation. Chemicals used in treatment include sulfuric acid, sodium hydroxide, ferrous sulfate, aluminum sulfate, and some polymers.

Tanks

The facility is comprised of what Chem Pro calls waste oil and waste water tanks. Tanks are covered and are located on concrete pads with concrete containment berms, except the 2 rectangular tanks alongside tank 112. Leak detection is visual and by gauging.

Security

The facility is located inside the Pier 91 compound. The Pier 91 Compound is surrounded by a fence 6 feet or more high and topped by barbed wire. To enter the compound, one must pass through a gate monitored by a guard. According to Chem Pro, a guard is on duty 24 hours a day. A number of other facilities and operations are also located inside the compound. There is also a roving security force at Pier 91.

Contingency Plan, Waste Analysis Plan, and Closure Plan

A copy of the facility Contingency Plan (dated 10/6/87), Closure Plan (dated 9/18/87), and Waste Analysis Plan (dated 9/26/86) was obtained by mail after the inspection. These plans have been referred to an EPA contractor for a seperate evaluation and report.

Drum Storage

Approximately 26 waste drums were observed in the facility warehouse. They were not dated. The drums were said to contain tank sludges that had been returned by CSSI because of sulfide content. They were stacked together, without aisle space to allow for inspection of individual drums. Drums of tank sludges were also in storage outside, at the rear of the facility. The drums in this area were also stacked together, with no aisle space. These also included drums rejected by CSSI because of sulfide content. Chemical analyses of these wastes indicate total levels of 400 ppm lead, 38 ppm cadmium, and 160 ppm chrome (see attached report of chemical analyses). These levels exceed 40 CFR Section 261.24 regulatory levels, but the testing was not pursuant to EP Toxicity procedures. The facility Part A does not provide for container storage.

Tanks

Tanks were inspected. All waste and sludge tanks were on concrete floors, and within bermed areas. All were covered and there were no apparent leaks. N. Matthews indicated that all sumps at the facility run to the oil/water seperator.

There are 2 open tanks outside the bermed areas. They are alongside tank 112. They are used for floculation and for treatment of wastes containing phenols.

The facility has an oil/water seperator pit. It is recessesed and has a metal grate over the top of it. Oily water loads are discharged to it. The facility has large screener baskets for filtering the material in the oil water seperator pit.

Closing Conference

A short closing conference with facility representatives was conducted. The facility was advised that drums should be organized to allow for inspection of each drum, and that training for new employees is required to be provided within 6 months of employment.

Findings

Specific findings appear above and on the attached checklist. Facility RCRA plans have been referred to contractors for review and evaluation. Due to my transfer from the RCRA Compliance Section, an abbreviated report has been prepared. The checklist (page I-1) contains a summary of findings.

RESOURCE CONSERVATION AND RECOVERY ACT (RCRA)

Region 10 Inspection Checklist

Purpose--This checklist is designed to serve as a guideline to the major points of the regulations adopted pursuant to RCRA for inspectors to use while visiting hazardous waste (HW) regulated facilities. This checklist should not serve as a substitute for a detailed knowledge of the relevant regulations. The following is the outline of the checklist.

I. General Information
II. Small Quantity Generator (SQG) Regulations (40 CFR 261.5)
III. Generator Regulations (40 CFR 262)
IV. Transporter Regulations (40 CFR 263)
V. Treatment, Storage, and Disposal (TSD) Interim Status Regulations (40 CFR 265)
VI. Treatment, Storage, and Disposal (TSD) Permit Status Regulations (40 CFR 264)

I. General Information (Date Revised November 21, 1983)

A. Date/Time Inspection commenced: 9/28/87

B. Facility
EPA/State ID WAD000812917
Name & Addresses (Chemical Processors Inc - Pier 91 Facility
1. Mailing: 2203 Airport Way South - Suite 400 - Seattle, WA 98134
2. Location: Pier 91
Seattle, Washington

Contact: Dennis Stefani - Mgr of Reg. Affairs / Nat Mathews Plant Mgr
Telephone: (206) 223-0500

C. Compliance Summary

	IN	OUT	N/A
RCRA (Statute)	( )	( )	( )
40 CFR 270	( )	( )	( )
40 CFR 124	( )	( )	( )
40 CFR 261.5	( )	( )	( )
40 CFR 262	( )	( )	( )
40 CFR 263	( )	( )	( )
40 CFR 264 (Permit)	( )	( )	( )
40 CFR 265	( )	( )	( )

Specific Violations: 262.11 - inadequate haz.waste determination for sludge; 262.23 - deficient manifest; 265.13 - failure to obtain detailed analyses for all waste streams; 265.15 - insp. logs don't include time; 265.16 - deficient training program; 265.147 + 265.143 - language of financial documents differs from that required; 280.3 - failure to notify state (if oil/water separator is an underground tank)

D. Inspector

Name (Print) Amy Bopp Title: EPS
Signature
Organization EPA - R-10
Phone 442-1858

E. **Inspection Participants:**

Name	Title	Phone #
L. Ashley	WDOE	
Jim Parkanin	EPA – ESD	
Rod Attwood	Chem Pro –	
Mark Mathews	Pioneer Plant algae	
Susan Donahue	Chem Pro Permit App. writer	
Keith Lund	" "	
Peter Ressler	" "	

F. **Notification/Permit Information**

1. **Started operation:** Site originally developed and used by Texaco in 1920s **Date:** 1971
2. **Notification filed:** (YES) NO **Date:** rec'd 8/18/80
3. **Part A application filed:** (YES) NO **Date:** 11/18/80
4. **Part B called/Date Due** YES NO **Date:** Not called
5. **Part B application:** YES NO **Date:** N/A
6. **Changes in Notification or Part A:** Part A revised 7/23/85, Also revised Part A submitted to State – 2/18/86 added TCY – Part A does not include container storage
7. **Facility's classified as:**

Generator	(✓)
Transporter	( )
Treatment facility	(✓)
Storage facility	(✓)
Disposal facility	( )
Small quantity generator	( )
Recycler	( )
Less than 90 day storage	( )
Wastewater treatment unit exemption (WWTU)	( )
Elementary neutralization unit exemption (ENU)	( )

8. Does facility have a Part A withdrawal request in ? YES (NO)

Status _____

Comments: _____

G. Hazardous Waste Generation (HW)and Management (List EPA Waste Code)

Part A

1. General information

a. Characteristic HW (DXXX)?

(1) Ignitability D001
(2) Corrosivity D002
(3) Reactivity D003
(4) EP Toxicity D004 – D011

b. Listed HW?

(1) HW from non-specific sources (FXXX)
(F017 F018 NOT on revised Part A)

(2) HW from specific sources (KXXX)
K049, K050, K051, K052, (K048 - added 2/18/86)

c. Discarded commercial chemical product(PXXX or UXXX)

(1) PXXX P110
(2) UXXX U188, U051, U052, U053, U117

d. Has facility petitioned to delist waste? YES (NO)

Date: Comments:

e. Does facility qualify for WWTU or ENU? (YES) NO

Comments: WWTU tanks – discharge to METRO POTW pursuant to pretreatment Permit

f. Has a determination been made for each waste generated that it is or is not a RCRA hazardous waste?

(1) What are the wastes generated? Tank Sludges

(2) How was the hazardous waste determination made for each waste (i.e., lab analyses, knowledge of waste streams or processes, waste listed in Part 261)?

Comments: Classified as state Dangerous waste – Inadequate testing to determine haz. waste status – See NARRATIVE

(3) Are records available on the determination(s)? (YES) NO

Inadequate – no EP Tox testing – total levels exceed regulatory levels for lead, cadmium or chromium

(4) Are all hazardous wastes noted during inspection listed on the facility's RCRA notification/ Part A application? (YES) NO

If so explain.

2. Specific information
Provide the following information for each of the individual HW streams listed above. (Complete a separate form for each HW.)

a. EPA HW Code
b. HW description
c. Composition (including sampling requirements)
d. Process producing waste:
e. Rate of waste production
f. Time of storage
g. Waste handling prior to disposal
h. Waste disposal practice and manifest
i. Reporting and recordkeeping
j. Comments

H. Miscellaneous Notes:

II. Small Quantity Generator (SQG) Regulations 40 CFR 261.5 (Date Revised November 21, 1983)

A. General

1. Has the generator ever accumulated more than 1000 kilograms of D, F, K or U coded HW or 1 kilogram of P coded HW [261.5(f)]? YES NO

   a. If yes, generator must comply with the generator regulations (262) and if stored for more than 90 days the applicable TSD regulations. Refer to Generator and/or TSD inspection checklist.

N/A

B. Small Quantity Generator (SQG) Regulations

1. A SQG must determine if he generates a hazardous waste (262.11). YES NO

2. Which of the following describes the SQG's treatment and/or disposal of his HW?

   a. occurs on-site YES NO

   b. ensure delivery to an off-site facility, either of which is:

      (1) permitted under Part 270 YES NO

      (2) in interim status under Part 270 and 265 YES NO

      (3) authorized to manage HW by an authorized state YES NO

      (4) permitted, licensed or registered by a State to manage municipal or industrial solid waste; or YES NO

      (5) (a) facility which

         (a) beneficially uses, re-uses recycles or reclaims his HW YES NO

         b. treats his waste prior to use, re-use, recycle, or reclamation YES NO

3. Does generator manifest his wastes (not required)? YES NO

III. Generator Regulations 40 CFR 262 (Date Revised November 21, 1983)

A. Is the facility or does facility claim to be a small quantity generator? YES (NO)

Comments:______________________

B. Does generator transport its own waste? YES (NO)

1. If NO, what is contractor's EPA ID, name, address, and phone? Safety-Kleen Corp. Resource Recovery TLD051060408 WAD061672812

2. If YES, see Transporter Regulations (Section III).

Safety Kleen ID # used for facility in Washington (phone - 206-775-7030 - appears to be in error - see attached manifest # 75093

C. Does generator use the manifest system? (YES) NO

1. Does the Generator ever offer his hazardous waste to transporters or to TSD facilities which do not have an EPA ID number? YES (NO)

What transporters or TSD facilities? not indicated during insp.

ship spent parts cleaner to Safety Kleen 1 drum every week or so

ship oil + tank bottom solids to CSSI - Arlington, OR

2. A generator transporting or offering for transport hazardous waste for off-site TSD must first prepare a manifest.

3. If the waste is undeliverable to the primary or alternate facility, the generator must either designate another alternate facility or instruct the transporter to return the waste.

Does the manifest contain the following information: For manifests checked see attached

a. Manifest document number (YES) NO

b. Generator's name, mailing address, phone number, and EPA ID number YES YES NO

except incomplete mailing address - manifest # 75093

c. Name and ID number of each transporter see above (B)(1) (YES) NO except

d. Name, address and EPA ID number of the designated and alternate TSD facilities, if any. (YES) NO

e. Description of waste(s) required by DOT regulations in 49 CFR 172.101, 172.202, 172.203. (YES) NO

- Proper shipping name — YES NO
- Hazard Class — YES NO
- Identification number — YES NO

f. Total quantity of <u>each</u> hazardous waste by units of <u>weight</u> or <u>volume</u> and type and number of containers placed aboard transport vehicle. — YES NO

4. Does the manifest contain the certification attesting to proper classification, description, packaging, labeling, marking and condition in accordance with DOT and EPA regulations? — YES NO

5. Does the manifest contain an adequate number of copies to provide one copy for:

a. Generator's records — YES NO

b. Records of each transporter — YES NO

c. TSD facility owner or operator's records — YES NO

d. Signature by each transporter and return to generator — YES NO

e. Signature by TSD facility and return to generator — YES NO

6. Does the generator use the manifest properly by:

a. Signing the certification — YES NO

b. Obtaining signature and date of acceptance from initial transporter — YES NO

c. Retaining one copy of the transporter's signed manifest for 3 years or until receipt of a signed copy from disposal facility — YES NO

d. Giving transporter the remaining copies of the manifest — YES NO

7. Does the generator contact the transporter and/or the designated TSD facility to determine the shipment status in the event that a signed copy from the designated facility has not been received within 35 days? — YES NO

8. Does the generator submit an Exception Report to the U.S. EPA in the event that a signed copy of the manifest has not been received from the designated TSD facility within 45 days? N/A YES NO

9. The Manifest Exception Report must include

   a. A legible copy of the manifest and

   b. A letter of explanation describing efforts and results of status investigation.

********** TSD FACILITIES SKIP TO MODULE V **********

D. Does generator operate a specific area on-site for container handling or storage? YES NO

1. Does generator comply with the requirements set forth in governing on-site waste accumulation: YES NO

   a. Labeling and marking YES NO

   b. Dating YES NO

   c. Inspections (weekly for containers) YES NO

2. Are incompatible wastes segregated? YES NO

3. What quantities of HW are stored? _____

4. What is the longest period that it has been stored? _____

5. Were there any hazardous wastes stored on site at the time of inspection? (90 day storage allowance is allowed only if waste is stored in accordance with §262.34; i.e. must be stored in containers or tanks. Thus need to make note if storing in waste pile, etc.) YES NO

   a. If yes, do they appear properly packaged (if in containers) or, if in tanks, are the tanks secure? YES NO

   b. If not properly packaged or in secure tanks, please explain. YES NO

   c. Are containers clearly marked and labeled? YES NO

   d. Do any containers appear to be leaking? YES NO

   e. If yes, approximately how many? _____

V. TREATMENT, STORAGE and DISPOSAL (TSD) Interim Status Regulations Facilities, 40 CFR 265. (Date Revised November 21, 1983)

A. Type of Activity

1. Storage

a. Containers	(Y — not on Part A)
b. Tanks	( )
(1) Above ground	( )
(2) Below ground	( )
c. Surface Impoundments	( )
d. Waste Piles	( )
e. Other	( )

see (V)(E)

2. Treatment

a. Settling	( )
b. Evaporation	( )
c. Filtration	( )
d. Energy Recovery	( )
e. Incineration	( )
f. Thermal Treatment	( )
g. Recycling/Recovery	( )
h. Chem/Phys/Biological	( )
i. Other	( )

3. Disposal

a. Landfill	( )
b. Land Treatment	( )
c. Surface Impoundment	( )
d. Incineration	( )
e. Other	( )

4. Comments:

5. Are hazardous wastes accepted from "outside" (off-site) sources(wastes not generated on site)? (YES) NO

a. If YES, has a chemical and physical analysis of a representative sample been obtained in accordance with 40 CFR 265.13? (YES) NO
See Response — Section V.B

b. Does the facility confirm that each hazardous waste received at the facility matches the identity of the waste on the manifest? (YES) NO

c. How does the facility determine this?
with verification analyses —

B. Subpart B - General Facility Standards (40 CFR 265.10 - 265.17)

1. **Does the facility obtain a detailed analysis of his waste prior to storing, treating, or disposing of it?** YES NO

Describe: waste loads examined not characterized by generator as hazardous waste — inadequate info provided — to determine if these materials were hazardous waste

2. **Does the facility follow a Written Waste Analysis Plan Does the Plan include?**

a.	Parameters to be tested?	YES NO
b.	Methods of analysis?	YES NO
c.	Methods to get representative samples?	YES NO
d.	Testing frequency?	YES NO

Comments:

3. **Did inspector collect a copy of the Plan for a thorough review of it at EPA's offices?** YES NO

4. **Security**

a. **Have site owner/operators taken appropriate measures to ensure against unauthorized entry?** YES NO

(1) **Are signs posted at each entrance to active portion, and at other locations, in sufficient numbers to be seen by an approach?** YES NO

(2) **Are they legible from a distance of 25 feet or more?** YES NO

(3) **Does the facility have a 24-hour surveillance system or artificial or natural barrier/or combination of both, to control access to the active portion?** YES NO

Comments: The facility is within a fenced compound (Chem Security) with other facilities. Design the facility itself is not within its own fence — Plan 91 reportedly provides 24 hour security for the Plan 91 compound

5. **Does the facility follow a Written Inspection Schedule (40 CFR 265.15?** YES NO

a. **Does it include inspecting all:**

Monitoring equipment?	YES NO
Safety and emergency equipment?	YES NO
Security devices?	YES NO
Detecting equipment?	YES NO

The Waste Analysis Plan contains waste streams without a prior waste profile — rely on historical knowledge of waste + processes generating the waste — do perform verification analysis on receipt — See Attached documents

No waste profile sheets provided / verification analyses were referenced — except for waste from Texas Chemical NW where a profile was provided

Waste Analysis Plan dated 9/15/87 referenced to EPA contractor for Evaluation

See below

Indicated

Dangerous waste storage areas? YES NO

b. Is this inspection schedule maintained at the facility? YES NO

c. Is an inspection log maintained? YES NO

(1) Is the log, or its summary, kept at the facility for at least three years from the date of inspection? YES NO

(2) Does the log include:

(a) date of time of inspection? YES NO

(b) inspectors name? YES NO

(c) observations? YES NO

(d) date and nature of repairs? YES NO

Comments:

6. Personnel Training (40 CFR 265.16)

a. Has a training program been developed? YES NO
What Type? (Classroom/on-the-job)

b. Does the program include contingency plan and response training? YES NO

c. Does the program include measures to familiarize personnel with emergency response equipment, procedures, and systems including: YES NO

(1) Procedures for using and maintaining equipment? YES NO

(2) Key parameters for automatic waste feed cut-off systems. YES NO

(3) Communications or alarm equipment YES NO

(4) Response to fire and explosions YES NO

(5) Response to ground water contamination incidents? YES NO

(6) Facility shut down? YES NO

d. Are records available at the facility for the following:

(1) Job title for each position related to hazardous waste management and maintaining equipment? YES NO

(2) Written job description for each job title? YES NO — 2 except maint man —

(a) Does the job description include the skill, education or qualifications required for the position YES NO — Not for all positions — not available for Duckman, Foreman Prod mgr, & maint man

(b) The duties assigned to that position? YES NO

(3) A written description of the type and amount of training to be given to those in each job position? YES NO

(4) A record of training completed or experience obtained for each job position by employee YES NO — Examined Records of 4 employees — see Below

(5) Was the required training obtained within 6 months of employment or by May 19, 1981, by each individual involved in hazardous waste management activities? YES NO — Not in All cases — see Below

See Attached Records — records include results of tests/quizes on procedures

J. Edmundson — hired 5/26/87 — trained 9/29/87

J. Nelson — tested in 83 + 85 — hired 6/19/75 — reg training provided 7/20/79 → 10/31/81 (chemical hazard safety procedures not provided till 10-31-81)

D. Carroll — hired 9/24/85 — ~~no~~ record of training in emergency procedures, provided after 6/86 — more than 6 months after hiring —

C. Light — hired date - not provided; training provided 9/13/83

C. Subpart C - Procedures and Preventions (40 CFR 265.30)

1. Is facility maintained and operated to minimize the hazards of fire, explosion, and sudden or non-sudden releases to the environment? (YES) NO

   Explain:

2. Is internal emergency communication equipment or alarm systems installed? (YES) NO

   What type? Air horns available — use 2 way radios to communicate with individuals in tank farm area — no yard alarm or intercom

3. Is a device (e.g., telephone) immediately available for summoning emergency assistance? (YES) NO

4. Are fire extinguishers or other emergency equipment immediately available on-site? (YES) NO

   fire fighting foam system —

5. Is emergency communications and response equipment tested? YES NO

   How often? water/foam system tested weekly — Fire dept. annual inspection — Fire extinguishers recharged yearly —

6. Is aisle space adequate for emergency response? YES (NO)

   What is the aisle spacing? Drums of sludge in storage stored stacked together w/out aisle space outside at rear of facility —

7. Have any arrangements been made with local emergency response organizations? (YES) NO — see 10/6/87 Contingency Plan

8. Which organizations? Seattle Fire Dept, Ecology, O.S.C.O., Metro — nature of arrangements not described —

9. If local organizations have declined to enter into response agreements, is this documented in the facility's operating record? N/A YES NO

   Explain

C. Subpart C - Procedures and Preventions (40 CFR 265.30)

1. Is facility maintained and operated to minimize the hazards of fire, explosion, and sudden or non-sudden releases to the environment? YES NO

   Explain:

2. Is internal emergency communication equipment or alarm systems installed? YES NO

   What type?

3. Is a device (e.g., telephone) immediately available for summoning emergency assistance? YES NO

4. Are fire extinguishers or other emergency equipment immediately available on-site? YES NO

5. Is emergency communications and response equipment tested? YES NO

   How often?

6. Is aisle space adequate for emergency response? YES NO

   What is the aisle spacing?

7. Have any arrangements been made with local emergency response organizations? YES NO

8. Which organizations?

9. If local organizations have declined to enter into response agreements, is this documented in the facility's operating record? YES NO

   Explain

D. **Subpart D - Contingency Plan and Emergency Procedures 40 CFR 265.50**

1. Has contingency plan been developed? (It may be a modified SPCC plan) — YES NO
   revised 10/6/87

2. Have incidents occurred where the plan has been implemented? — YES NO
   According to M. Matthews

3. Have incidents occurred where the plan should have been implemented but was not — YES NO

   Explain — Not as best as could be determined

4. A copy of the plan should either be obtained for post-inspection office review or it should be examined during inspection for the following:
   Plan referred to Contractor for evaluation

   a. Does the plan describe actions to be taken by personnel in response to fire, explosion, or releases to the environment? — YES NO

   b. Does the plan describe arrangements made with external emergency response organizations? — YES NO

   c. Does the plan list those qualified to act as emergency coordinator including their name, address, and phone? — YES NO

      (1) Is the list current? — YES NO

   d. Is all emergency equipment available at the facility listed in the plan? — YES NO

      (1) Is the location and a description of the equipment included? — YES NO

      (2) Are capabilities described for each piece or equipment unit? — YES NO

   e. Does the plan include evacuation procedures including a description of signals to initiate evacuation (and routes and alternative routes)? — YES NO

f. Is a copy of the plan maintained at the active facility (versus main office)? **YES** NO

(1) Has a copy been supplied to appropriate off-site emergency response organizations? **YES** NO
To which? except - doesn't include hospital or medical facility

5. Is at least one designated person __always__ available to respond to emergencies (i.e., of those on the coordinator list)? YES NO
How are they available ← A person on call - answering service during off hours
no assurance of availability

Acc. to Chem Pro
Chem Pro has response contract w/ Crowley Env.
can activate that contract for response

6. What are the limits of this person's authority to respond to emergencies?

a. Has an emergency occurred? YES NO

b. Was the plan implemented? YES NO

c. (Describe the incident)

E. Subpart E - Manifest System, Recordkeeping, and Reporting 40 CFR 265.70

For manifests reviewed - see attached records

1. Manifest System

Most material shipped to the facility was not manifested — waste oil destined for reclamation

a. Upon receipt of a manifested hazardous waste shipment, does the TSD facility:

(1) Sign and date each copy of manifest receipt of certifying waste? (YES) NO

(2) Note any discrepancies on each copy? (YES) NO

(3) Give delivering transporter one signed and dated copy of the manifest? YES NO — Not determined

(4) Send a S/D copy of the manifest to the generator within 30 days after delivery and? YES NO — "

(5) Retain a copy of each manifest at the facility for 3 years from delivery? (YES) NO

b. If the TSD facility initiates a hazardous waste shipment, does it comply with generator requirements in Part 262? ~~YES NO~~ — See Part III this checklist

c. Does the TSD facility examine manifests and wastes received to detect any significant discrepancies in quantity or type of waste, such as: (YES) NO

(1) Bulk waste-quantity variation of 10 percent or greater

(2) Batch waste - any variation in piece count

(3) Waste type - obvious differences discernible by inspection or waste analysis

d. If significant discrepancies are found, does the TSD facility: — None identified

(1) Reconcile discrepancies with generator or transporter within 15 days? or YES NO

(2) Immediately submit to EPA-RA a Discrepancy Report describing the discrepancy and attempts to resolve it and a copy of the manifest involved? YES NO N/A

e. TSD facilities must keep a written operating record documenting the following details:

(1) Waste description and quantity received

(2) Methods and dates of its treatment, storage, and disposal

(3) The location and quantity of each HW at the facility see 2(b) below

2. Operating Record

a. Does the owner/operator of the facility maintain an operating record at the facility (40 CFR 265.73)? YES NO

b. Does the record contain the following information.

(1) A description of, and the quantity of each HW received, and the method(s) and date(s) of its treatment, storage, or disposal at the facility? use daily activity logs YES NO

(2) The location of each Hazardous Waste within the facility, and its quantity? must track from date of receipt through Daily activity logs — not easily done YES NO

(3) A map showing disposal sites? YES NO N/A no disposal on site

(4) Summary reports and details of all incidents that require implementing the Contingency Plan? YES NO N/A not implemented to date

(5) Records and results of inspections as required (need only be kept three years)? YES NO

(6) All closure and post-closure cost estimates required for the facility? YES NO

(7) The results of testing and waste analysis? YES NO

3. Facility Reporting Procedures

a. Has the owner/operator prepared and submitted a single copy of the Annual Report to EPA by March 1 of each year? YES NO

See Ecology Insp Report for 6/22/87 inspection

b. Is owner/operator familiar with procedures for emergencies? YES NO

Appears To Be

c. If a TSD facility accepts a regulated hazardous waste shipment without the required manifest or shipping paper, does it file an "Unmanifested Waste Report" within 15 days or receipt? YES NO N/A

F. Subpart F - Ground-Water Monitoring (40 CFR 265.90)

1. Are ground-water (GW) monitoring regulations required at this facility? YES (NO)

N/A
No disposal at the site indica

2. If YES, what is the relevant process unit?

a. Surface impoundment ( )
b. Waste pile ( )
b. Land treatment ( )
c. Landfills ( )
d. Other ( )
Describe:

3. Has the owner/operator implemented a ground water monitoring plan? YES NO

4. If NO, has the facility implemented one of the following:

a. GW Waiver [265.90(c)] ( )
b. Alternate GW Monitoring System [265.90(d)] ( )
c. Neutralization Waiver (265.90(e)] ( )
d. Describe:

5. Does the ground water monitoring program consist of the following:

a. At least 1 upgradient and 3 downgradient wells? YES NO
b. GW Sampling and Analysis Plan YES NO
c. GW sampling quarterly first year YES NO
d. GW sampling semiannually after that YES NO
e. Drinking Water Standards parameters YES NO
Sampling frequency_____
f. GW Quality parameters YES NO
Sampling frequency_____
g. GW Indicator parameters YES NO
Sampling frequency_____
h. GW elevation parameters YES NO
i. Outline GW Quality Assessment Program YES NO
j. Statistical Analysis of Indicator parameters YES NO

Results:

6. Has the facility implemented GW Quality Assessment program. YES NO

   a. Date: _____
   b. Results:

7. Does the facility maintain the necessary records.

   a. Initial background parameter concentrations YES NO
   b. Subsequent parameters concentrations YES NO
   c. Statistical evaluations YES NO

8. Has the facility reported necessary information YES NO

   a. DW Standards for 1st year YES NO
   b. GW Indicator parameters annually YES NO
   c. Statistical evaluation YES NO

9. Comments:

G. Subpart G - Closure and Post-Closure (40 CFR 265.110)

Closure

1. - Has the facility developed a closure plan which outlines all necessary steps to safely close the facility? (40 CFR 265.117) Closure Plan developed -- Dated 9/15/87

Closure Plan forwarded to Contractor for evaluation

   a. Description of how and when the facility will be partially closed (if applicable) and finally closed? YES NO

   b. Estimate of the maximum inventory of wastes in storage and in treatment at any time during the life of the facility? YES NO

   c. Description of the steps needed to decontaminate the facility equipment during closure? YES NO

   d. Comment:

Post-Closure

N/A no disposal indicated

2. Has the facility developed a post-closure plan which contains the following steps to safely care for the facility after closure/post-close of the facility? (40 CFR 265.117)

   a. Description of how post closure will be carried out for the next 30 years. ( ) ( )

   b. Notice to the local land authority within 90 days after closure is completed? ( ) ( )

   c. Notice in deed to property? ( ) ( )

H. Subpart H - Financial Requirements 40 CFR 265.140

1. Liability

- a. (1) Does facility maintain liability insurance for sudden occurrences in the amount of at least $1 million per occurrence with an annual aggregate of at least $2 million? YES NO

(2) By what method did the owner/operator demonstrate sudden liability coverages to the RA?

(a) If HW facility liability endorsement(s) ( )

(b) If HW facility certificate(s) of liability insurance (+)

(c) financial test ( )

(d) corporate guarantee ( )

(e) multiple mechanisms (specify) ( )

2. If a surface impoundment, landfill, or land treatment exist at the facility,

b. (1) does facility maintained liability insurance for nonsudden occurrence in the amount of at least $3 million per occurrence with an annual aggregate of at least $6 million? YES NO N/A Not an LDF

(2) By what method did the owner/operator demonstrate non-sudden liability coverage to RA?

(a) HW facility liability endorsement(s)' ( )

(b) HW facility certificate(s) of liability insurance' ( )

(c) financial test ( )

(d) corporate guarantee ( )

(e) multiple mehcanisms (specify) ( )

c. Has owner/operator submitted an originally signed duplicate of liability coverage demonstration to RA?

d. Is wording of liability coverage instruments identical to - that specified in 40 CFR ~~264.517~~ 264.151(j) YES (NO)

Comment: See attached copy in insp. file for 7/87 Clean Fs - Lucille St. inspection — language changes made to comply with WAC 173-303-400 & 303-620(10) however, — used "WDOE" - rather than Department"

2. Assurance

a. Closure

Referred to Contractor for Evaluation

(1) Has facility prepared a written estimate of the cost of closing the facility in accordance with the closure plan (40 CFR 265.112)? YES NO

(2) Is this cost estimate adjusted annually for inflation? YES NO

(3) Has facility established financial assurance for the closure of the facility (40 CFR 265.143)? YES NO

(4) By what method has this been achieved:

(a)	Trust fund	(✓)
(b)	Surety bond (with standby trust)	( )
(c)	Letter of credit (with standby trust)	( )
(d)	Insurance	( )
(e)	Financial test	( )
(f)	Corporate guarantee	( )
(f)	Multiple mechanisms	( )

(5) Has facility submitted an originally duplicate of financial assurance to RA? YES NO

Trust Agreement been revised to conform to Washington State requirements & Revised Agreement awaiting WDOE + EPA concurrence

(6) Is wording of the financial assurance statement identical to that specified in 40 CFR 264.151 YES NO

(7) Comment:

b. Post-Closure (Disposal Facilities)

N/A not an LDF

(1) Has facility prepared a written estimate of the cost of post-closure monitoring and maintenance of the facility (40 CFR 265.144)? YES NO

(2) Is this cost estimate inflation adjusted annually YES NO

(3) Has owner/operator established financial assurance for the post-closure care of the facility (40 CFR 265.145)? YES NO

(4) By what method has this been achieved:

(a)	Trust fund	( )
(b)	Surety bond (with standby trust)	( )
(c)	Letter of credit (with standby trust	( )
(d)	Insurance	( )
(e)	Financial test	( )
(f)	Corporate guarantee	( )
(g)	Multiple Mechanisms	( )

8. Has owner/operator submitted an originally signed duplicate of financial assurance to Regional Administrator? YES NO

9. Is wording of the financial assurance statement identical to that specified in 40 CFR 264.151? YES NO

See Comments ABOVE

I. Subpart I Use and Management of Containers (40 CFR 265.170)

1. Does this section apply to this facility? YES NO

2. Are the containers made of or lined with materials which will not react with and are compatible with the hazardous waste to be stored in them? YES NO

3. Are the containers always closed, except to add or remove waste? YES NO

4. Are container storage areas inspected weekly for leaks and container deterioration (40 CFR 265.174)? YES NO

5. Are precautions taken to prevent accidental ignition or reaction of ignitable or reactive waste? YES NO

6. Are containers holding ignitable or reactive waste located at least 50 feet from the facility's property line? YES NO

7. Is the facility aware of and complying with the following requirements for incompatible wastes:

   a. Incompatible wastes must not be placed in the same containers, unless in compliance with 265.17(b) YES NO

   b. HW must not be placed in an unwashed container that previously held an incompatible waste YES NO

   c. Are storage containers holding HW that are incompatible with any waste or other material stored nearby separated from or protected from them by means of a dike, berm, wall, or other device? YES NO

   Explain?

8. Are containers marked or labeled in a manner equivalent to 40 CFR 172 subpart E? YES NO

9. Comments:

J. Subpart J - Tanks (40 CFR 265.190)

1. Does this section apply to this facility? (YES) NO

2. - Do tanks on the facility hold hazardous waste? (YES) NO

   If so, what are their contents?
   residual sludges —

3. Is storage in tanks conducted such that:

   a. It does not generated heat, pressure, fire, explosion or violent reaction? (YES) NO
      (If no, explain) except - some tanks have steam coils - part of treatment.

   b. It does not produce uncontrolled toxic mists, fumes, dusts, or gases? (YES) NO
      (If no, explain)

   c. It does not produce uncontrolled flammable fumes or gases? (YES) NO

   d. It does not damage the tank? no damage observed (YES) NO

   e. It does not threaten the environment in other ways (i.e., leaks, spills)? (YES) NO

      Comments: no leaks or spills observed — tanks have secondary containment —

4. Is 2 feet of freeboard maintained in uncovered tanks? Tanks covered w/ vents YES NO

   If no, is secondary containment used? YES NO

   (Explain) is secondary containment — concrete bermed area — except for rec. tank

5. Is the tank(s) continuously fed? YES (NO)

   If yes, is there a means to stop inflow? YES NO

   Explain N/A

6. Are Hazardous Waste storage tanks operated in a manner which minimizes the possibility of overfilling? (YES) NO

   How:
   - Waste feed cut-off ( )
   - Bypass system to another tank ( )
   - High level alarm ( )
   - Other GAUGES — record keeping —

7. Are inspections of the following conducted:

a. Discharge control equipment? (YES) NO
How often? weekly

b. Waste feed cut-off systems? N/A YES NO
How often?

c. Data from tank monitoring equipment? (YES) NO
How often Tank gauge - daily or as needed

d. The level of waste in the tank? (YES) NO
How often? See ABOVE

e. The structural integrity of tank? (YES) NO
How often? weekly visual
How are inspections conducted? See Attached 1055
What is observed (looked for)?

f. The immediate area around the tank for signs of leaks and the integrity of secondary containment (if any)? (YES) NO

8. Have any tanks once used for storage of hazardous waste been closed or their function changed? When?
TANK 118 - Damaged by addition of acid - was closed but up & set out for scrap metal in 1986

a. Were all hazardous wastes and/or residues removed? See attached certification 7/14/86 (YES) NO must have been out of service since tank 1970's

b. What was the disposition of the wastes or residues (i.e., where did it go)? YES NO See attached insp log

c. When shipped? Not determined

9. Are ignitable or reactive wastes placed in tanks? YES (NO)
No such indication.

10. If yes, what measures are used to prevent ingnition or reaction?

11. Have wastes been placed in a tank which previously contained potentially incompatible waste or residue? YES (NO)
No such indicatic

12. If reactive or ignitable wastes are stored in covered tanks, are they in compliance with the National Fire Protection Association's buffer zone requirements? N/A
YES NO

13. Are "No Smoking" signs posted? (YES) NO

14. Have others measures been adopted to reduce hazards associated with storage of ignitable or reactive waste in tanks? N/A YES NO

- Explain

15. Waste Analysis and Trial Tests

Before treating and storing of hazardous waste in a tank is a detailed chemical and physical analysis of the waste obtained? See response (V)(B) (YES) NO

16. Does the company have and follow a written waste analysis plan? new WAP developed — dated 9/26/86 YES NO

a. Does the plan identify parameters used? (YES) NO

Explain To be evaluated separately by EPA contractor

b. Sampling Method? (YES) NO

Explain

c. How frequent is analysis repeated? (YES) NO
Sample verification analyses each time received

d. Are results of waste analysis and trial tests placed in the facility's operating record. yes

17. Are waste analyses done when a tank is used to treat or store a HW which is substantially different or treated differently from waste previously treated or stored in the tank? (YES) NO

K. Subpart K - Surface Impoundments (40 CFR 265.220)

1. Does this section apply to this facility? YES NO

2. Does the surface impoundment maintain enough freeboard to prevent any overtopping of the dike by overfilling, wave action, or a storm? YES NO

3. Are the surface impoundments designed and operated to allow two feet of freeboard? YES NO

4. Do earthen dikes have a protective cover which minimizes erosion (grass, rock, shale)? YES NO

5. Is a waste analysis or trial test conducted whenever a surface impoundment is used to chemically treat a HW which is substantially different or treated differently from waste previously treated in the surface impoundment? YES NO

6. Are results of waste analyses documented in the facility's operating record? YES NO

7. Are the surface impoundments inspected on a routine basis? How often? YES NO

8. Are ignitable or reactive wastes held in a surface impoundment (40 CFR 265.229)? YES NO

9. Comments:

The following 40 CFR Subparts do not have a specific checklist prepared because few of these types of facilities exists in Region X. Inspection made at facilities which operate any of the following would require the inspector to prepare an inspection checklist prior to the site visit.

L. Subpart L - Waste Piles (40 CFR 265.250)
M. Subpart M - Land Treatment (40 CFR 265.270)
N. Subpart N - Landfills (40 CFR 265.300)
O. Subpart O - Incinerators (40 CFR 265.340)
P. Subpart P - Thermal Treatment (40 CFR 265.370)
Q. Subpart Q - Chemical, Physical, and Biological Treatment (40 CFR 265.400)
R. Subpart R - Underground Injection (40 CFR 265.430)

VI. Treatment, Storage, and Disposal (TSD) Permit Regulations (40 CFR 264) (Date Revised November 21, 1983)

This Part of the checklist does not have a specific checklist prepared because the checklist would be different for each facility. A compliance inspection made at a facility which has been issued a Part B Permit needs to have checklist and/or narrative which reviews all of the requirements of the facility's Permit. This checklist and/or narrative needs to be developed by the individual inspector.

HSWA Requirements

	YES	NO	COMMENTS
Underground Tanks			No underground tanks installed since 5/7/85
1. If an underground product storage tank has been installed since May 7, 1985, does it comply with the following standards:			
a. Will it prevent releases due to corrosion or structural failure for the operational life of the tank (280.2(a)(1))?	___	___	
b. Is it cathodically protected against corrosion, constructed of non-corrosive material, or designed in a manner to prevent the release or threatened release of any stored substance (280.2(a)(2))?	___	___	
c. Is it constructed or lined with material that is compatible with the substance to be stored (280.2(a)(3))?	___	___	
2. Did the facility notify the State (or EPA if on Indian lands) by May 8, 1986, of any tank(s) in the ground as of January 1, 1974 (280.3)?	___	✓	D Stephanie indicated – had communication w/ L. Ashley of State Dept of Ecology – Agreed oil/water seperator not an underground tank

HSWA Requirements

Loss of Interim Status (§270.73)

	YES	NO	COMMENTS
1. For any units that lost Interim Status on Nov. 8, 1985, are any of those units still accepting RCRA hazardous waste?	___	___	N/A - Not a land disposal facility
a. Which ones?			
b. What is the specific proof that the waste is RCRA-regulated? (obtain copies of on-site representative waste analyses; operating record showing discharges to unit; or any written documentation to clearly verify that the waste is RCRA-regulated).			
2. If the facility has ceased accepting hazardous waste, what was the last date on which RCRA hazardous waste was placed in such unit(s)? Where is this documented?			
3. Are any of the RCRA units now accepting waste that is non-hazardous or regulated only by the State?	___	___	
a. What is the evidence that the waste is not RCRA-regulated? (obtain copies of variances, waste analyses, etc.).			
4. If the facility is no longer receiving hazardous waste in a land disposal unit, please explain how the facility is currently managing their hazardous waste (e.g., tanks, discharge to sewer, etc.)			

HSWA Requirements

	YES	NO	COMMENTS
Part 266, Subparts D and E			
Prohibitions			
1. Are mixtures of hazardous waste and used oil used for dust suppression (266.23)?		✓	
2. Is any hazardous waste fuel or off-specification used oil fuel burned in restricted (non-industrial) boilers or furnances (266.31(b) and 266.41(b))?		✓	
3. If the facility is a cement kiln located within the boundaries of a municipality of population greater than 500,000, and is not operating as a RCRA incinerator, are they burning hazardous waste fuel (266.31)?		✓	Not A cement Kiln
Notification			
1. Is the facility engaged in any of the following activities with respect to either used oil fuel or hazardous waste fuel 266.34 and 266.43:			
a. marketing?	✓		All processed used oil sent to PENULO — use is 100% marine diesel engine use according to D Stephanie
b. processing?			
c. burning?			
If not, Part 266, Subparts D & E do not apply.			
2. If so, has the facility notified EPA of those waste-as-fuel activities (in addition to their original notification (266.34 b), 266.35, 266.43(b), and 266.44)?			See exception 50 FR 49193

	YES	NO	COMMENTS
Storage If the facility handles hazardous waste fuel, is it stored in compliance with Part 265 (266.34(c))? (Effective 5/29/86)			N/A ~~See Atta~~ [illegible]

Recordkeeping

A. Used Oil Fuel (UOF):

	YES	NO	COMMENTS
1. If the facility is the first marketer to claim that the used oil fuel meets all the specifications listed in 266.40(e), do they have records of the analyses (or other adequate information) to document that claim (266.43(b)(6))? (Lead specification is not effective until 5/29/86)			N/A - see above sells only for marine usage
2. Does all off-specification UOF meet the rebuttable presumption of mixing with hazardous waste (1,000 ppm total halogen) (266.40(c))? If not, the fuel is considered a hazardous waste fuel and must be handled as such. (See (B) below)			Test all used oil that is 50% or less bottom sediment + water w/ Dorman Analyzer - According to facility reps. if 1000 chlorides retest - w/ commercial lab - if haz. waste fuel shipped to Georgetown facility - According to facility reps
3. Does the facility have copies of invoices for all off-spec. UOF shipments sent or received (266.43(b)(6) and 266.44(e)? (Effective 3/31/86)			Not determined Not described in the waste analysis plan

	YES	NO	COMMENTS
4. If the facility markets to a burner, or is itself a burner, do they have on record a copy of the burner's certification that they have notified EPA of waste-as-fuel activities and will only burn in unrestricted boilers or furnaces (i.e., industrial boilers and furnaces burning to recover useful heat energy, as specified in 261.41(b)), (266.43(b)(6) and 266.44(e))? (Effective 3/31/86)	___	___	N/A
B. Hazardous Waste Fuel (HWF):			No shipments of haz. waste fuel handled at the Cueille St. facility
1. Does the facility have records of manifests for all shipments of hazardous waste fuel sent out or received (262.40, 264.71(a), and 265.71(a))? (Effective 3/31/86)	___	___	
2. If the facility markets to a burner or is itself a burner, is there, on record, a copy of the burner's certification that they have notified EPA of waste-as-fuel activities and will only burn in unrestricted boilers and furnaces (i.e., industrial boilers and furnances burning to recover useful energy, as specified in 266.31(b)), (266.34(f) and 266.35(e))?	___	___	N/A

HSWA Requirements

	YES	NO	COMMENTS
Part 262			
1. If the facility generates between 100 and 1,000 kg/ month, are all shipments off-site accompanied by a manifest (261.5)?	✓		
2. Does the generator sign the waste minimization certification on the manifest (Part 262, Appendix)?	✓		
3. Did the facility submit the required annual report on exports (due 3/1 each year) (262.50(d)?			No exports indicated
4. Does the operating record contain an annual certification by the permittee that:			N.A determined
a. There is, to the extent economically practicable, a program in place to reduce the volume and toxicity of the hazardous waste that generates? and			
b. The proposed method of treatment, storage, or disposal is that practicable method currently available to the permittee which minimizes the present and future threat to human health and the environment (264.73(b)(9))?			

HSWA Requirements

Prohibition on Land Disposal of Liquids

		YES	NO	COMMENTS
1.	Is the facility disposing of any noncontainerized or bulk liquid hazardous waste in any salt dome formation, salt bed formation, underground mine or cave (264.18(c) and 265.18)?	___	✓	
2.	Is the facility landfilling any bulk or non-containerized liquid hazardous waste or free liquids contained in hazardous waste (266.314(b) and 265.314(b))?	___	✓	
3.	Is the facility landfilling any non-hazardous liquid without approval of the Regional Administrator (264.314(e) and 265.314(e))?	___	___	

HSWA Requirements

Parts 264 & 265 - Minimum Technological Requirements

	YES	NO	COMMENTS
A. Landfills and Surface Impoundments			N/A
1. With respect to any surface impoundment or landfill, does the facility have any new unit, replacement of an existing unit or expansion of an existing unit which first received waste:			
After 11/8/84 and continued receiving waste on or after 5/8/85 (for facilities operating under Interim Status)?	___	___	
After the date of permit issuance (for facilities which received a permit after 11/8/84)?	___	___	
If no, this section does not apply.			
2. a. For any landfill, has the unit been granted one of the variances in §264.301(d) or (e) or §265.301(c) or (d)?	___	___	
b. For any surface impoundment, has the unit been granted one of the variances in §264.221(d) or (e) or §265.221(c) or (d)?	___	___	
If the unit has been granted one of the above variances, this section does not apply.			

	YES	NO	COMMENTS
3. Does such unit comply with the following minimum technological requirements (265.221(a) and 264.221(c) for the surface impoundments, and 265.301(a) and 264.301(c) for landfills):			
a. Is the unit lined with two or more liners?	___	___	_____
b. For surface impoundments, is there a leachate collection system installed between the liners (265.221(a))?	___	___	_____
c. For landfills, is there a leachate collection system installed above and between the liners (265.301(a)?	___	___	_____
d. Is the top liner designed, operated, and constructed of materials to prevent the migration of any constituent, into such liner during the period the facility remains in operation (including any post-closure monitoring period)?	___	___	_____
e. At a minimum, is the lower liner constructed of at least a 3-foot thick layer of recompacted clay or other material with a permeability of no more than $1x10^{-7}$ cm/sec.?	___	___	_____
f. Do the liners and leachate collection extend to any area of such unit that is in contact with the waste?	___	___	_____

	YES	NO	COMMENTS
4. For interim status landfills (265.301(b)) and surface impoundments (265.221(b)) that are subject to the above minimum technological requirements:			
a. Was EPA notified at least sixty days prior to the first date on which such unit received waste?	___	___	
b. Did the facility submit their Part B permit application within six months of EPA's receipt of that notice?	___	___	
B. Waste Piles			N/A
1. With respect to any interim status waste piles, does the facility have any new unit, replacement of an existing unit or expansion of an existing unit which first received waste after 11/8/84 and continued to receive wastes on or after 5/8/85 (265.254)?	___	___	
If no, this section does not apply.			
2. For any such waste pile that has not been granted a variance under 264.250(c) or 264.251(b), does such waste pile meet 264.251(a) liner and leachate control system requirements (265.254)?	___	___	

HSWA Requirements

Corrective Action Program Development

1. **Does the facility have SWMU's?**
Assign each yes response a consecutive number. Describe unit in comments section.

		YES	NO	COMMENTS
1.	Landfill	___	___	Not determined — RCRA Facility Assessment to be conducted by EPA Contractor / Facility representative did identify a spill of bunker oil from tank 92 on 11/17/78
2.	Surface Impoundment	___	___	
3.	Land Farm	___	___	
4.	Waste Pile	___	___	
5.	Incinerator	___	___	
6.	Storage Tank (above ground)	___	___	
7.	Storage Tank (below ground)	___	___	
8.	Container Storage Area	___	___	
9.	Injection Wells	___	___	
10.	Wastewater Treatment Units	___	___	
11.	Transfer Stations	___	___	
12.	Loading/Unloading Areas	___	___	
13.	Waste Recycling Operations	___	___	
14.	Waste Treatment Units	___	___	
15.	Waste Detoxification Units	___	___	
16.	Others	___	___	

2. **Is there any indication of a possible release?**
(seeps, discolored soil, stressed vegetation, etc)

1.	SWMU 1	___	___	
2.	SWMU 2	___	___	
3.	SWMU 3	___	___	
4.	SWMU 4	___	___	
5.	SWMU 5	___	___	
6.	SWMU 6	___	___	
7.	SWMU 7	___	___	

3. **Have any monitoring, sampling, closure activities or mitigation efforts occured at any of the SWMU's? Attach copies of reports and data.**

1.	SWMU 1	___	___	
2.	SWMU 2	___	___	
3.	SWMU 3	___	___	
4.	SWMU 4	___	___	
5.	SWMU 5	___	___	
6.	SWMU 6	___	___	
7.	SWMU 7	___	___	was mistakenly overfilled — Approximately 9800 barrels spilled — Cleaned up most — Some residual soil cont. probable

Inspector: A. Boyd
Address: EPA - Reg. 10 - Seattle, WA
Telephone No: —

RCRA LAND RESTRICTION F-SOLVENT GENERATOR CHECKLIST

I. HANDLER IDENTIFICATION

A. Handler Name	B. Street (or other identifier)
Chemical Processors	Pier 91

C. City	D. State	E. Zip Code	F. County Name
Seattle	WA	98119	King

G. Nature of Business; Identification of Operations
Wast Oil recyclers -

H. EPA ID #
WADD 000 812 917

I. Handler Contact (Name and Phone Number)
Dennis Stefani - (206) 767-0350

II. GENERATOR COMPLIANCE

A. F-Solvent Identification

1. Does the handler generate the following wastes?

a. F001 ___Yes ___No
b. F002 ___Yes ___No
c. F003 ___Yes ___No

Not indicated

If an F003 wastestream listed solely for ignitability has been mixed with a non-restricted solid or hazardous waste, does the resultant mixture exhibit the ignitability characteristic? ___Yes ___No

d. F004 ___Yes ___No
e. F005 ___Yes ___No

Do generate spent parts cleaner - recirculate by safety Kleen - classified as F001 - send to be reclaimed or recycled

2. Source of the above: Form 8700-12 ___; Part A ___; Part B___;
other (specify) ___ Inspection findings - review of manifests -

Appendix A is intended to assist the inspector and enforcement official in determining whether the facility is generating F-solvent wastes, if such wastes were not identified by the facility previously. If you are concerned that F-solvent wastes may be misclassified or mislabeled, turn to Appendix A. Note concerns below: —

Handler Name: ~~A. Boy~~ Chem Pro Pioneer 91
ID Number: ______
Inspector: A. Boyd
Date: 7/28/87

B. BDAT Treatability Group - Treatment Standards Identification

Comments

1. Did the generator correctly determine the appropriate treatability group [268.41] of the waste (Wastewaters containing solvents, pharmaceutical wastewaters containing spent methylene chloride, all other spent solvent wastes)?

   ___Yes ___No

N/A

C. Waste Analysis

1. Did the generator determine whether the waste exceeds treatment standards based on [268.7(a)]:

   a. Knowledge of wastes ___Yes ___No

   b. TCLP ___Yes ___No

   c. Other (specify) ______

   If knowledge, note how this is adequate:

   ______

   If determined by TCLP, provide date of last test, frequency of testing, and attach test results.

   Dates/frequency: ______

   Note any problems: ______

   d. Were wastes tested using TCLP when a process or wastestream changed?

   ___Yes ___No

2. Did the F-solvent wastes exceed applicable treatability group treatment standards upon generation [268.7(a)(2)]? ___Yes ___No ___Some

3. Did the generator dilute the waste or the treatment residual so as to substitute for adequate treatment [268.3] ___Yes ___No

D. Management

1. Onsite management

   a. Were F-solvent wastes managed onsite?

   ___Yes ___No

If yes, answer 1(b) and (c); if no, answer 2.

No such indication — from during inspection — from review of manifests outgoing + incoming — + associated records

see attached

Handler Name: Chem Pro - Pier 91
ID Number:
Inspector: A. Bato
Date: 7/28/87

Comments

b. For wastes that exceed treatment standards, was treatment, storage, and/or disposal conducted?
___Yes ___No

If yes, TSDF Checklist must be completed.

c. Are test results maintained in the operating record [264.74(b)3/265.73(b)(3)]?
___Yes ___No

N/A

2. Offsite Management

a. If F-solvent wastes exceed treatment standards, did generator provide treatment facility [268.7(a)(1)]:

(i) EPA waste number? ___Yes ___No

(ii) Applicable treatment standard? ___Yes ___No

(iii) Manifest number? ___Yes ___No

(iv) Waste analysis data, if available?
___Yes ___No

Identify offsite treatment facilities_____

b. If F-solvent wastes did not exceed treatment standards, did generator provide the disposal facility [268.7(a)(2)]:

(i) EPA Hazardous waste number? ___Yes ___No

(ii) Applicable treatment standard? ___Yes ___No

(iii) Manifest number? ___Yes ___No

(iv) Waste analysis data, if available?
___Yes ___No

(v) Certification that waste meets treatment standards? ___Yes ___No

Identify land disposal facilities receiving the BDAT certified wastes_____

Handler Name: Chem Pro - Final
ID Number:
Inspector: A. Boyd
Date: 9/28/87

Comments

c. If waste is subject to nationwide variance [268.30] (e.g., solvent-water mixtures less than 1%), case-by-case extension [268.5] or petition [268.6] does generator provide notice to disposer that waste is exempt from land disposal restrictions [268.7(a)(3)]?
___Yes ___No

E. Storage of F-Solvent Waste

1. Was F-solvent waste stored for greater than 90 days (after variance 180/270 days for SQG) [268.50(a)(1)]?
___Yes ___No

If yes, was facility operating as a TSD under interim status or final permit? ___Yes ___No

N/A

If yes, TSDF Checklist must be completed.

F. Treatment Using RCRA 264/265 Exempt Units or Processes (i.e., boilers, furnaces, distillation units, wastewater treatment tanks, etc.)

1. Were treatment residuals generated from RCRA 264/265 exempt units or processes? ___Yes ___No

If yes, list type of treatment unit and processes

_____

_____

_____

If the residuals from a RCRA-exempt treatment unit are above the treatment standards, the owner/operator is considered a generator of restricted waste. The inspector should determine whether the generator requirements, particularly waste identification requirements, have been met for the treatment residuals.

California List Waste

Not indicated

1) Does the handler generate the following wastes?

Wastes generated since 7/8/87 limited to tank bottom sludges + a spent parts cleaner — classified as D001 waste petroleum naptha

a. Liquid hazardous wastes having a PH less than or equal to two [2.0]? ____ Y __✓__ N

b. Liquid hazardous wastes containing polychlorinated biphenyls (PCBs) at concentrations greater than or equal to
50 ppm? ____ Y __✓__ N
500 ppm? ____ Y __✓__ N

c. Liquid hazardous wastes that are primarily water and contain halogenated organic compounds (HOCs) in total concentration greater than or equal to 1000 mg/l and less than 10,000 mg/l HOCs? ____ Y __✓__ N

2) a. Is the Paint Filter Liquids Test (PFLT method 9095) performed as described by SW-846 to determine whether waste is in liquid form? not determined ____ Y ____ N

b. Did facility obtain representative chemical and physical analysis of wastes and residues [264.13(a) 265.13(a)]? of bottom sludges __✓__ Y ____ N

3) If waste was determined to be in liquid state according to PFLT, was waste solidified using an absorbent? __✓__ Y ____ N

4) What type absorbent was used? Super fine "flyash & Lime

5) What type of waste was absorbent added to (refer to question 1)? (Check where applicable) Tank Bottom Solids (unless resulting from listed waste – may not be a haz. waste)

a. Liquid hazardous waste having a PH less than or equal to 2 ____

b. Liquid hazardous waste containing PCB in concentrations greater than 50 ppm ____; greater than 500 ppm ____ indication of PCB cont to 6 PPB

c. Liquid hazardous waste containing HOCs in concentrations greater than or equal to 1000 mg/l and less than 10,000 mg/l ____

See attached waste profile prepared for CSSI

6) Did handler determine whether the concentration levels (not extract or filtrate) in the waste equal or exceed the prohibition levels or whether waste has a PH less than or equal to two [2.0] based on:

a. Knowledge of wastes __✓__ Y ____ N
b. Testing __✓__ Y ____ N
List method not determined

If knowledge, note how this is adequate: ____

7) a. Did handler determine if concentration levels* in PFLT extract exceed cyanide & metals treatment standards?

___ Y ✓ N not cyanide tested

b. List test method used. _____

c. List constituent and concentration level which exceeded prohibition levels. _____

_____

8) Did generator treat waste on-site or send off-site (Identify off-site facility)? Solidified on site — off-site disposal — CSSI Arlington, OR

9) If waste was determined to be restricted from land disposal (i.e., liquid, exceeding concentration levels and/or PH less than 2.0) did handler provide treatment facility: N/A

(i)	EPA waste number?	___ Y ___ N	Liquids not shipped
(ii)	Specified treatment standard?	___ Y ___ N	
(iii)	Manifest number?	___ Y ___ N	
(iv)	Waste analysis data, if available?	___ Y ___ N	

10) Did generator/treater dispose of waste on-site or send off-site? off-site

Identify off-site disposal facility CSSI - Arlington, OR

11) If waste was determined not restricted from land disposal, did handler provide disposal facility with: N/A

(i)	EPA hazardous waste number?	___ Y ___ N	
(ii)	Manifest number?	___ Y ___ N	
(iii)	Waste Analysis Data, if available?	___ Y ___ N	
(iv)	Specified treatment standard?	___ Y ___ N	
(v)	Certification that waste passed PFLT (non-liquid), or does not exceed specified prohibition levels?	___ Y ___ N	

12) Are restricted wastes containing PCBs (i.e., concentration greater than or equal to 50 ppm) stored greater than 1 yr?

___ Y ✓ N

13) Does facility handle any of the following waste:

a.

(i) Waste containing HOC greater than or equal to 1000 mg/kg (non-liquid hazardous waste)

___ Y ✓ N

(ii) Waste containing HOC greater than or equal to 10,000 mg/l (liquid hazardous waste)

___ Y ✓ N not indicated

(iii) Waste containing HOC greater than 1000 mg/l and less than 10,000 mg/l and are not dilute HOC waste water?

___ Y ✓ N not indicated

* Cyanide and metals concentration levels not yet codified in Regulation. Statutory levels under 3004(d)(2) should be used.

If yes, answer 13(b) and (c), if no, answer 14.

13) b. Is any waste listed in 13(a) disposed of in a land fill or surface impoundment? ____ Y ____ N

If yes, continue, if no answer 14.

c. Is facility in compliance with section 268.5(h)(2) [New, replacement, or laterally expanded units must meet minimum technology requirements] and section 264 & section 265 Subpart F ground-water monitoring requirements? N/A

____ Y ____ N

14) If facility handles any liquid hazardous waste containing PCB complete the following section:

a. List concentration levels of PCB in waste stream(s) 33 to 1.2 ppm PCBs (ppm)

b. Describe method of treatment/disposal of wastes(s) listed in section (a) and identify facility receiving this waste

Stored — Shipped to Chem Pro - Tacoma — 8/1/87

c. Does facility perform any type of mixing of PCB containing liquid hazardous waste with same or other types of wastes or liquids? ____ Y ____ N

d. If yes, state reason for mixing: No such mixing indicated

Conference room 11B.

11/9/88

WA 2917

ENFORCEMENT SENSITIVE

FILE COPY

Off-Site Policy - inspections 2x/year

3013 became effective June 30th, 1988 - issued unlikely

Plan submitted August 1988

Findings Required for Issuance

(1) the presence of any hazardous waste at a facility or site at which hazardous waste has been stored, treated, disposed of or

(2) the release of any such waste from such facility or site may present a substantial hazard to human health or the environment.

information sufficient to determine

a) "presence" may present a substantial hazard.

b) the release may present a substantial hazard.

laboratory analysis.

observations recorded during inspection

corroborate citizen complaints

orders may be used to the owner/operator

Statutory definition of hazardous waste RCRA 1004(5) is applicable in 3013 order not the regulatory definition

Requires the submittal of a proposal.

Failure to conduct work may result in a civil action

* Purpose of order to determine the extent + nature of "the" release"

This information is used to determine what, if any, actions will follow.

agency make determination after 3013. info submitted

no release identified → no further action.

[additional investigative work may be necessary under permit process.]
3004(u).

release identified. → 3008(h) order - necessary to protect human health + environment.

process ties into the permit process (3004u process - requires permits impose corrective action for releases of hazardous waste or constituents which pose a threat to health + env. from any SWMU.

release is defined in final condification rule (July 15, 1985)

spilling, leaking, pouring, emitting, discharging, injecting, escaping, leaching, dumping or disposing into the environment.

routine, systematic, deliberate.

3008(h) not confined to addressing releases from solid waste management unit.

Agency intends to develop corrective action guidelines. "target levels"

It is the Agency's current intention to set these target levels using health + env based goals

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Possible scenarios.

corrective action order required 3008(h)

~~or~~ RFA, RFI, CMS., CMI

interim measures.

more wells on site, possibly off-site, possible groundwater treatment, possible soil excavation + removal.

Chempro Meeting: 10/10.

In active arbitration with Port of Seattle. - arbitrating only lease.

Port is increased for release. -

Chempro leases property. have sub-lease with PANOCO. (≤ 85%).
Provide PANOCO with fuel. - provide spec oil.

Port as signed state certification.
Will be permitting ≤ <15%.

- Closure issue. 3004(n).
- 3008(h).

- Schedule - Develop Findings.
Arrange. Meeting with. Port, PANOCO, Chempro.